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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-00511 RS
)	
v.)	STIPULATION AND PROPOSED ORDER
)	CONTINUING MATTER AND EXCLUDING
JERMAINE JONES,)	TIME UNDER 18 U.S.C. § 3161
)	
Defendant.)	
_____)	

On November 27, 2012, the parties made a third status appearance before the Court during which time a motions briefing schedule was set with defendant's motions being due on January 29, 2012. Further, the parties requested, and the Court ordered, a continuance until January 29, 2012, because the United States produced several items of discovery to defendant which will require defendant's review and further investigation. Thus, the purpose of the continuance request was to afford defense counsel adequate time to review the additional

1 discovery.

2 The parties also requested, and the Court ordered, that the time between November 27,
3 2012 and January 29, 2012, would be excluded from the running of the speedy trial clock for
4 effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking
5 into account the public interest in prompt disposition of criminal cases, good cause exists for this
6 extension. The parties also agreed that the ends of justice served by granting such a continuance
7 outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
8 3161(h)(7)(A).

9 SO STIPULATED:

10
11 MELINDA HAAG
United States Attorney

12
13 DATED: November 28, 2012

14 /S/
NATALIE LEE
Assistant United States Attorney

15
16 DATED: November 28, 2012

17 /S/
BRANDON LEBLANC
Attorney for Jermaine Jones

18 For the reasons stated above, this matter is continued until January 29, 2012, when
19 defendant's motions are due. The Court finds that the exclusion of time from November 27,
20 2012 through January 29, 2012 is warranted and that the ends of justice served by the
21 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18
22 U.S.C. § 3161 (h)(7)(A). The failure to grant the requested continuance would deny the
23 defendant effective preparation of counsel and would result in a miscarriage of justice. 18 U.S.C.
24 § 3161(h)(7)(B)(iv).

25 SO ORDERED.

26 DATED: 11/28/12

27 
HONORABLE RICHARD SEEBORG
United States District Judge